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Marlene H. Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Re: WT Docket No. 03-66; Amendment of Parts 1, 21, 73, 74 and 101 of the Commission's Rules to Facilitate the Provision of Fixed and Mobile Broadband Access, Educational and Other Advanced Services in the 2150-2162 and 2500-2690 MHz Bands

Dear Ms. Dortch:

South Carolina Educational Television Commission ("SCETV") writes to support the position of the National EBS Association ("NEBSA") on EBS white space licensing, as reflected in NEBSA's ex parte submission of June 5, 2009.

SCETV is an agency of the State of South Carolina. It operates what may be the premiere EBS network in the country, consisting of 67 constructed EBS facilities that have provided multi-channel coverage of schools and other educational sites across South Carolina for many years. SCETV's EBS network was supported by the State of South Carolina, which committed enormous resources to its construction and operation. SCETV's network has recently been undergoing the transition to the new wireless broadband band plan, and is in a state of technical and operational change. However, SCETV and the State of South Carolina are committed to the continued use and implementation of SCETV's EBS network for the ubiquitous delivery of educational and wireless broadband services to the people and institutions of South Carolina.

The SCETV EBS network stations were originally applied for in the context of the development of a site-based, multi-channel video service, with each station being carefully engineered to provide coverage to specific areas, such as school districts. The resulting station GSAs provide a patchwork quilt of coverage of the state, with significant bits and pieces of white space between stations that make a contiguous wireless broadband infrastructure plan difficult to design and implement.

SCETV believes that the rapid deployment of a wireless broadband system throughout the state would be aided by allowing it a significant opportunity to fill in those coverage gaps,

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and therefore SCETV originally supported, and still supports, the NEBSA plan for GSA expansion.

Moreover, as the FCC can imagine, if a white space licensing plan were to be implemented based on the Catholic Television Network's June 1, 2009 proposal, or something similar to it, SCETV would feel significantly and unfairly disadvantaged, as it would be limited in each application window to applying for one channel group in the white space of one BTA. SCETV would thus be unable to fill in most of the various bits of white space between its stations. Even worse, from a policy standpoint, given the nature of these typically small, irregularly shaped and non-contiguous areas, they would have little viability in being separately licensed to others.

Thus, SCETV urges, if the FCC decides not to adopt the NEBSA GSA expansion approach, and if it determines to implement a solution along the lines of the CTN, that the opportunities for filing applications in a window be expanded for all applicants including SCETV. While SCETV would prefer the right to try to apply to expand all its licenses, it would support permitting up to 10 applications in a window, as suggested by NEBSA.

SCETV also urges that the FCC move quickly to resolve these issues. As noted by NEBSA, deployment of wireless broadband services in the 2.5 GHz band is now at a critical point, and EBS white space in many places can and should be part of that deployment. This is particularly so given that the availability of BTOP funding over the next year or so.

Respectfully submitted,

SOUTH CAROLINA EDUCATIONAL
TELEVISION COMMISSION

By: David L. Crouch
Its 6/12/09